

AMANDA N. LISKAMM
Director, Consumer Protection Branch
MANU J. SEBASTIAN
Trial Attorney
U.S. Department of Justice
Consumer Protection Branch
450 Fifth Street, NW, Suite 6400S
Washington, D.C. 20001
Telephone: (202) 514-0515
Facsimile: (202) 514-8742
Email: Manu.J.Sebastian@usdoj.gov

E. MARTIN ESTRADA
United States Attorney
MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division
VALERIE L. MAKAREWICZ (Cal. Bar No. 229637)
Assistant United States Attorney
Major Frauds Section
1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-0756
Facsimile: (213) 894-6269
E-mail: Valerie.Makarewicz@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON EDWARD THOMAS CARDIFF,

Defendant.

No. 5:23-CR-00021-JGB

**EX PARTE APPLICATION FOR 2 WEEK
CONTINUANCE OF HEARING ON
DEFENDANT'S MOTIONS TO DISMISS**

*[Filed concurrently with
[Proposed] Order]*

**I. CONTACT INFORMATION FOR OPPOSING COUNSEL PURSUANT TO C.D. CAL
LOCAL RULE 7-19**

Stephen R. Cochell
Admitted *Pro Hac Vice*
5850 San Felipe, Ste. 500
Houston, Texas 77057

713-436-8000
Email: srcochell@gmail.com

Allan Grant (SBN #213658)
Grant's Law Firm
17351 Greentree Drive
Riverside, California 92503-6762
888-937-7555
Email: allan@grants-law.com

II. APPLICATION

The United States of America, by and through its counsel of record, the Consumer Protection Branch of the United States Department of Justice and Trial Attorney Manu J. Sebastian, and the United States Attorney for the Central District of California and Assistant United States Attorney Valerie L. Makarewicz, hereby requests the Court continue the hearing on Defendant's Motion to Dismiss Counts 3 and 4 (Dkt. # 134, 136) and Motion to Dismiss Case (Dkt. # 135, 137), filed December 2, 2024, from December 30, 2024, by two weeks, to January 13, 2025.

While there is no Local Criminal Rule on briefing schedules for motions to dismiss, using Local Civil Rule 7-9 as a model, the government would have to file an opposition twenty-one days before the hearing, which on the current schedule is Monday, December 9, 2024. The first instance the government learned of defendant's motion was via email on November 27, 2024, when both the undersigned were on pre-planned holiday leave.

Given the extended length and complexity of the motions, as well as the volume of exhibits attached to each motion, the government requests a brief continuance of the hearing date from December 30, 2024, to January 13, 2025, so it may oppose the motions in full and have such oppositions timely reviewed by both DOJ and the USAO. As

1 such, the government respectfully requests the Court set a briefing
2 and hearing schedule as follows:

3 December 23, 2024 - Opposition Date for both motions

4 December 30, 2024 - Reply Date for both motions

5 January 13, 2025 - Hearing Date for both motions

6 The government proposes the above schedule as it provides
7 sufficient time for the government to respond to the defendant's
8 motions and facilitates consideration by the Court in advance of the
9 January 13, 2025 pre-trial conference date, saving Court resources.

10 The government conferred with Defendant, inquiring if he opposed
11 the proposed schedule on December 3, 2024. Counsel for defendant
12 responded on December 4, 2024: "[w]hile we do not particularly want
13 to have a hearing on December 30, 2024, there is little time left in
14 January to resolve motions."

15 Based upon the above, the government respectfully requests the
16 Court enter an order setting the proposed briefing and hearing
17 schedule.

18
19 Dated: December 4, 2024

Respectfully submitted,

20 AMANDA N. LISKAMM
21 Director
Consumer Protection Branch

22 E. MARTIN ESTRADA
23 United States Attorney

24 /s/
MANU J. SEBASTIAN
25 Trial Attorney
26 VALERIE L. MAKAREWICZ
Assistant United States Attorney
27 Attorneys for Plaintiff
UNITED STATES OF AMERICA
28